

**Amendments to the Drawings:**

Enclosed with this Response are drawing sheets 1-34 that include changes to Figs. 1-31. These sheets, which includes Figs. 1-31, replaces the original drawing sheets 34. No new matter has been added to replacement sheets 1-34. Each revision to a drawing sheet was made by Applicants to clarify various aspects of the present invention that were disclosed in the originally filed specification.

In particular, Applicants added reference numerals to Figs. 7, 10, 15, 22 and 27-31 to identify elements disclosed in the originally filed specification. Reference number 125 was added to Fig. 7 to clarify the motor assembly housing disclosed in paragraph [0081] of the specification. The “first and second horizontal planes,” which are recited in several of the claims, were added to Figs. 10 and 15 (see first horizontal plane 1HP and second horizontal plane 2HP) to illustrate a feature disclosed in the originally filed specification. Reference numbers were erroneously missing from Figs. 22 and 27-28 and 30B. Finally, drawing sheet numbers (*e.g.*, 1/34, 2/34, etc.) have been added to each drawings sheet.

Attachments: Replacement sheets 1-34 (attached hereto as Exhibit A).

## **REMARKS**

Applicants have amended claims 9, 22, 26-31, 34-36, 42, 44 and 46-47.

Claims 1, 4, 8-10 and 18-50 were pending in the Application prior to the outstanding Office Action. In the Office Action, (i) claims 9, 26-31, 34-36, 44, 46 and 47 were objected to due to alleged informalities in the claims, (ii) claims 22 and 23 were rejected under 35 U.S.C. §112, second paragraph, (iii) claims 1, 8, 18-19, 21 and 24 were provisionally rejected on the ground on non-statutory obviousness double patenting as being unpatentable over claims 1 and 4 of copending Application No. 10/087,638, (iv) the specification was objected to, and (v) the drawings were objected to.

### **I. RESPONSE TO CLAIM OBJECTIONS**

On page 3 of the Office Action, the Examiner objected to claims 9, 26-31, 34-36, 44 and 46-47 because each claim references a “housing” and several “ housings” are disclosed in the specification. Applicants have amended claims 9, 26-31, 34-36, 44 and 46-47 to clarify which “housing” is being recited in the particular claim. For example, claim 9 has been amended to clarify that the “housing” recited in claim 9 comprises a “port door drive mechanism housing.” Similarly, claim 26 has been amended to clarify that the “housing” recited in claim 26 comprises a “vertical drive housing.” Claims 27-31, 34-36, 44 and 46-47 have been amended in a similar fashion.

### **II. RESPONSE TO REJECTIONS UNDER 35 U.S.C. §112, SECOND PARAGRAPH**

On page 3-4 of the Office Action, the Examiner rejected claims 22-23 under 35 U.S.C. §112, second paragraph.

#### **A. Dependent Claim 22**

Applicants have amended claim 22 to correct a typographical error. In particular, Applicants have replaced the term “seat” in line 4 of claim 23 with the term “seated.”

#### **B. Dependent Claim 23**

Dependent claim 23 depends directly or indirectly from dependent claim 22. This dependent claim includes all of the limitations of the dependent claim from which it depends. Applicants respectfully assert that dependent claim 23 is allowable for at least the reasons set forth above concerning dependent claim 22.

### **III. RESPONSE TO DOUBLE PATENTING REJECTION**

On page 4 of the Office Action, the Examiner provisionally rejected claims 1, 8, 18-19, 21 and 24 on the ground of non statutory obviousness-type double patenting as being unpatentable over claims 1 and 4 respectively of co-pending Application No. 10/087,638 (the “’638 Application”). Applicants submit a Terminal Disclaimer to obviate the double patenting rejection over the ‘638 Application (attached hereto as Exhibit B). Therefore, Applicants respectfully assert that claims 1, 8, 18-19, 21 and 24 are in condition for allowance.

### **IV. RESPONSE TO OBJECTION TO SPECIFICATION**

On page 3 of the Office Action, the Examiner objected to the specification because paragraphs [0002] and [0003] do not identify the related applications. On page 2 of this Response, Applicants have submitted substitute paragraphs [0002] and [0003], which properly identifies the related applications and overcomes the Examiner’s objection. Each related application identified in the substitute paragraphs is still pending with the U.S. Patent & Trademark Office.

### **V. RESPONSE TO OBJECTION TO SPECIFICATION**

On page 2 of the Office Action, the Examiner objected to the drawings for failing to show the location of the “first and second horizontal planes,” which are recited in several of the claims. On page 5 of this response, Applicants identify the specific amendments made to the drawings to overcome the Examiner’s objection.

### Additional Remarks

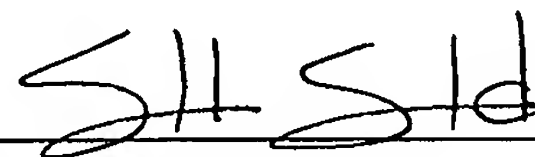
The references cited by the Examiner but not relied upon have been reviewed, but are not believed to render the claims unpatentable, either singly or in combination.

In light of the above, it is respectfully submitted that all of the claims now pending in the subject patent application are allowable, and a Notice of Allowance is requested.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 50-3548 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

Date: May 12, 2006

By:   
Scott D. Sanford  
Reg. No. 51,170

Scott D. Sanford, Esq.  
O'MELVENY & MYERS LLP  
Embarcadero Center West  
275 Battery Street, 26th Floor  
San Francisco, California 94111-3344  
Telephone: (415) 984-8700  
Facsimile: (415) 984-8701  
Email: ssanford@omm.com

SF1:620680.1